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OFFICE OF THE SECRETARY

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October 18, 2000

Ex Parte

EX PARTE OR LATE FILED

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th St., S.W. – Portals
Washington, DC 20554

RE: Application by Verizon New England Inc., et al., for Authorization To Provide In-Region, InterLATA Services in Massachusetts, Docket No. 00-176

Dear Ms. Salas:

At the CCB staff's request the information provided in the attached letter details a discussion that took place during the October 16 meeting that Verizon had with the CCB staff re the above proceeding. An ex parte filed on October 17 also presented materials disccussed at that meeting. Confidential and redacted versions of the ex parte are being filed. The twenty-page limit does not apply as set forth in DA 00-2159.

Please let me know if you have any questions.

Sincerely,

Dee May

Attachments

cc: E. Einhorn
S. Pie

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October 17, 2000

Ex Parte

Mr. Eric Einhorn
Policy and Program Planning Division
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Application by Verizon New England Inc., et al., for Authorization To Provide In-Region, InterLATA Services in Massachusetts, Docket No. 00-176

Dear Mr. Einhorn:

This letter provides the additional detail that you requested and that we discussed in our meeting yesterday clarifying the processes and procedures associated with Verizon's unbundled digital subscriber line ("DSL") loops and line sharing products. In particular, it will make clear that the processes and systems used for pre-ordering, ordering, provisioning, and maintenance and repair are the same in Massachusetts as in New York. We have not addressed the billing OSS in this letter because xDSL and line shared loops are billed using the same systems and processes as other unbundled loops in both Massachusetts and New York. We also show that Verizon's separate data affiliate ("SDA"), where it is in operation, is subject to the same processes and procedures for obtaining line sharing as all other competing carriers.

I. Unbundled DSL Loops

A. Pre-Ordering

CLECs can perform the pre-order transactions described in Ms. McLean's and Mr. Wierzbicki's Declaration (¶¶ 18-29) prior to requesting an unbundled xDSL loop. For example, a CLEC can check an end user's customer service record ("CSR") to see what services the customer currently has, can determine if a loop is qualified (i.e., capable of supporting DSL), or validate as the end user's address. Verizon provides CLECs, including those providing xDSL services, with access to the same pre-order systems and functionality in Massachusetts as it does in New York. The pre-ordering interfaces and gateway systems used in Massachusetts are identical to those used in New York -- that is, one set of software and hardware supports both New York and New England (which includes Massachusetts). Similarly, the underlying OSSs (LiveWire for address validation and loop qualification; CRIS for customer service records) are the same software in New York and New England, although there is a copy on a hardware complex serving New York and a copy on a comparable hardware complex serving New

England. This means CLECs seeking pre-order information on loops in order to provide xDSL services follow the same procedures and rely on the same OSSs in both Massachusetts and New York.

CLECs have a choice of three different electronic interfaces to obtain access to pre-ordering information for xDSL loops in Massachusetts and New York. They can use the Web-based Graphical User Interface ("Web GUI"), the Electronic Data Interchange ("EDI") interface, or the Common Object Request Broker Architecture ("CORBA") interface. A CLEC receives the same pre-ordering information regardless of the interface it chooses. A CLEC using the Web GUI interface will see the same pre-ordering screens (i.e. with information displayed in an identical format) in both New York and Massachusetts. Attachment A to this letter shows two response screens providing loop qualification information in response to a loop qualification request – the first page shows the response for a requested Massachusetts loop, and the second page shows that a CLEC requesting qualification for a loop in New York receives the same information in the same format. A CLEC using one of the application-to-application interfaces (CORBA or EDI) uses the same input and output record formats and business rule specifications in both New York and Massachusetts. Because an application-to-application interface allows the CLEC to design the way its system uses and/or displays the pre-order information returned to it, however, Verizon does not know whether the CLECs' screens look the same from one state to another.

To pre-qualify a loop, a CLEC submits a loop qualification request using its chosen interface to Verizon's LiveWire database which contains loop qualification (and other) information. As of July 2000, the database included loop qualification information for 93 percent of Verizon's central offices in Massachusetts with collocation arrangements in place. If the customer is served by a central office for which LiveWire has loop qualification information, the CLEC will receive information regarding the loop's qualification status in real time through its interface. The response to the loop qualification inquiry will indicate whether the loop is qualified and the loop length; if the loop is not qualified, the response also indicates the reason it is not qualified, such as the existence of digital loop carrier, interferors such as T-1 or load coils. See Attachment A.

If loop qualification for the customer's central office has not been included in LiveWire yet, or if a CLEC chooses not to pre-qualify a loop, a CLEC can request a manual loop qualification when it submits its local service request ("LSR") for an xDSL loop by entering an indicator in the appropriate field that manual loop qualification is needed. Attachment B shows the Web GUI screens that are used by a CLEC to order an unbundled loop xDSL-capable loop. These screens are identical for Massachusetts and New York, except that the state abbreviation at the top of each form would show the appropriate state. As shown on the Loop Service Request form, field 20b provides "drop down" selections allowing the CLEC to indicate that it has already pre-qualified the loop ("Completed") or that loop qualification is "Required." If the CLEC leaves the field as "Not Selected," the gateway systems – upon recognizing the loop type being requested is xDSL – will return an error message to the CLEC indicating that it must indicate whether the loop qualification is Completed or Required.

B. Ordering

Once pre-ordering is complete, the CLEC is ready to submit an LSR for an unbundled xDSL loop. Verizon's wholesale web site provides extensive information about xDSL-capable loops, including descriptions of the various loop types that are provided and detailed technical references. The web site URL is http://www.bellatlantic.com/wholesale/html/ps_dsl_une.htm. Verizon provides CLECs seeking xDSL loops with the same ordering systems and functionality in Massachusetts as it does in New York. As with pre-ordering, CLECs use the same ordering interfaces and gateway systems in Massachusetts and New York to order xDSL loops -- there is one set of software and hardware that supports both New York and New England, which includes Massachusetts. Similarly, the underlying OSS (the service order processor, or "SOP") is the same in Massachusetts and New York, although there is a copy on a hardware complex serving New York and a copy on a comparable hardware complex serving New England. CLECs can submit LSRs using the Web GUI interface and the EDI interface. Regardless of the electronic interface a CLEC uses, LSRs for xDSL loops in New York and Massachusetts are all processed in the same Boston DSL/Line Sharing Center.

LSRs for new connect xDSL loops of 1 to 9 lines can flow through directly into Verizon's SOP. Orders requesting a manual loop qualification cannot flow through and, along with all other xDSL orders that do not flow through, are automatically directed to the Boston DSL/Line Sharing Center, which is devoted exclusively to processing orders for unbundled xDSL loops and line sharing for New York and New England. As noted in Ms. McLean's and Mr. Wierzbicki's Declaration (¶ 58), the Boston DSL/Line Sharing Center had 122 service representatives and is in the process of adding 90 additional representatives by the end of the year. The Center handled 50,000 DSL and line sharing LSRs in August.

For orders that require a manual loop qualification, a representative verifies the information on the LSR, enters the relevant information into a request form and transmits the request to the Loop Qualification Center ("LQC"). Because the LQC handles all manual loop qualifications for the former Bell Atlantic region, the same personnel perform manual loop qualifications for unbundled xDSL loops in Massachusetts and New York. The LQC checks the LiveWire database to determine the loop length, whether the loop is qualified, and the reason why it is not qualified if it is not, and also performs a mechanized line test ("MLT") on the loop to verify the loop length. The LQC may also check the Loop Facility Assignment and Control System ("LFACS") which will indicate whether Verizon is working in the terminal serving the end user's address – for example to add, remove or rearrange cable. If LFACs indicates that such work is ongoing, the LQC must forward the request to engineering for further evaluation. The LQC does not use LFACS to determine the "loop make-up" for the requested loop, because only a small percentage of loops (7-10%) have loop make-ups in LFACS, and because LiveWire is periodically synchronized with LFACS so that if qualification information (such as loop length or presence of DLC or load coils) has been added to LFACS it will also update LiveWire. The LQC then returns its findings to the DSL/Line Sharing Center.

If the loop is qualified, the DSL/Line Sharing Center returns a local service request confirmation ("LSC" or "LSRC") to the CLEC providing, among other things, a committed due date. If the loop is not qualified, the DSL/Line Sharing Center returns a "query" to the CLEC

indicating the same information regarding why the loop is not qualified that the CLEC would receive from LiveWire if the loop qualification information had been in the database. Attachment C shows an LSR received by the Boston DSL/Line Sharing Center indicating that manual loop qualification is required (page 2, field = LOOPQUAL; R = Required). Pages 3 – 6 of Attachment C show the request form used by the DSL/Line Sharing Center to forward information to the LQC and to receive a response from the LQC. Based on the NC, NCI and SECNCI codes submitted by the CLEC (page 1), which indicate the characteristics of the loop desired by the CLEC for the service it wishes to offer, the DSL/Line Sharing Center indicates to the LQC what type of loop it is seeking to qualify (page 3). The LQC's response is returned to the DSL/Line Sharing Center in Section 2 of the form (pages 4-5). Page 7 shows the query returned to the CLEC providing the results of the manual loop qualification. Attachment D shows that the LSR received by the Boston DSL/Line Sharing Center, and the query returned to the CLEC are the same for New York as they are for Boston.

If the LQC is unable to determine the loop length and qualification from LiveWire or MLT, or if LFACS indicates that work is being done in the terminal, the LQC forwards the request to the Facilities Management Center ("FMC"). In the FMC, engineers examine paper records to determine the loop length, whether or not the loop is qualified, and the reasons why it is not, if it is not. The FMC returns the information to the DSL/Line Sharing Center (see Attachment 3, pages 5-6 (Section 3)), which returns the information to the CLEC as previously described. This information is also used to update the LiveWire database.

A CLEC may also submit an Engineering Record Request to Verizon. This is a request for a full loop make-up, including loop length, type of facility, cable gauge for each section of the loop, location of any load coils, and location and length of any bridge tap. This type of request is also handled by the FMC, and involves a detailed examination of Verizon's paper records for the loop. The information returned to the CLEC is far more detailed than the information returned in response to a manual loop qualification request. To date, Verizon has received no more than a few Engineering Record Requests.

Whether the LSR automatically flows through to the service order processor or requires manual intervention, as part of the ordering process, CLECs receive an acknowledgement from Verizon that the order has been received and a local service confirmation once the order has been entered into the service order processor (sometimes called a firm order confirmation or "FOC").

C. Provisioning

Once the LSR enters the service order processing system, an order is issued which moves through the provisioning systems and processes on a mechanized basis. These provisioning systems include the Work Force Administration ("WFA") system which provides dispatch requirements to technicians, LFACs which inventories and assigns loop facilities, and SWITCH which inventories and assigns central office facilities. There is one set of SWITCH software and hardware that supports both New York and New England (including Massachusetts). For WFA and LFACs, the same software supports both New York and New England, although there is a copy on a hardware complex serving New York and a copy on a comparable hardware complex serving New England (which includes Massachusetts).

As part of the provisioning process for most unbundled xDSL loop orders, Verizon will dispatch a technician to the field to install the xDSL loop. When the installation is complete, the technician will call the CLEC to have the CLEC test the loop to ensure it meets the applicable technical specifications, and obtain a serial number from the CLEC indicating that the CLEC accepts the loop.

After the loop is installed, the technician will close out the order in WFA. WFA then updates the SOP to show that the work has been completed. SOP then notifies Verizon's gateway system that the installation work is complete and the gateway system generates a provisioning completion notice to the CLEC. SOP also passes provisioning completion information to Verizon's billing systems which generate the CLEC's bill.

The provisioning interval in Massachusetts for most DSL loop orders of up to 6 loops that are pre-qualified is six days. If the loops are not pre-qualified, an additional 3 days must be added to the interval to account for the need to perform a manual loop qualification. Historically, a large percentage of CLEC orders have not been pre-qualified, although Verizon has worked with the CLECs to help them improve their processes.

D. Maintenance and Repair

The maintenance and repair processes for unbundled xDSL loops are identical for both Massachusetts and New York. Verizon provides two electronic interfaces through which CLECs can obtain access to Verizon's maintenance and repair OSS -- the Web GUI and the Electronic Bonding Interface ("EBI"). Most CLECs that use an OSS for maintenance and repair utilize the Web GUI for repair purposes. The Web GUI provides access to a platform called Repair Trouble Administration System or "RETAS". The Electronic Bonding Interface allows CLECs to connect their systems directly to Verizon's maintenance and repair OSS. These interfaces are described in more detail in Ms. McLean's and Mr. Wierzbicki's Declaration (¶¶ 82-88), and are used by CLECs providing xDSL services in the same way they are used by CLECs providing other stand-alone unbundled loops.

CLECs can perform the same trouble administration functions using RETAS as Verizon's retail representatives can. Among other things, CLECs with unbundled xDSL loops can create trouble tickets, obtain trouble status, modify a trouble ticket, or request cancellation of an existing trouble ticket. CLECs using EBI can create, modify, close, cancel trouble tickets, and obtain the status of trouble tickets. In addition to submitting a trouble ticket using RETAS or EBI, a CLEC can also call in its trouble to Verizon's Regional CLEC Maintenance Center ("RCMC"). This is how most CLECs report xDSL troubles to Verizon.

Verizon offers repair appointments for repairing troubles for xDSL loops. Generally, if the CLEC submits the trouble before 11 am, Verizon will commit to clearing the trouble by 7pm the same day. If the CLEC submits the trouble after 11 am, Verizon will generally commit to clearing the trouble by 7pm the next day, although CLECs can request a later appointment if it is more convenient for them or their customer. For example, because many CLECs serve primarily

business customers, they may report a trouble on Friday afternoon and prefer a Monday appointment, even though Verizon offers Saturday repair appointments.

The CLEC's trouble ticket will show the results of any test conducted by the CLEC for the line and inform Verizon of whether the trouble is inside or outside the central office. Because unbundled xDSL loops do not contain dial tone, Verizon has no way to test these loops and must rely heavily on the CLEC's testing and instructions for trouble isolation. Depending on where the CLEC indicates the trouble is, Verizon will dispatch a technician either in the central office (which is referred to as a "dispatch in") or to the field (which is referred to as a "dispatch out").

Once the technician identifies and resolves the problem on the line, he calls the CLEC and the two perform a cooperative test to ensure that the line is working properly. If the CLEC does not have its own test equipment or the CLEC does not answer the technician's call for cooperative testing, the technician will close out the trouble. Once the trouble is closed, a representative from the RCMC will call the CLEC to notify it that the trouble has been cleared. Notification of the cleared trouble will also appear in RETAS.

II. Line Sharing

A. Pre-Ordering

CLECs that provide line sharing have the ability to perform the same pre-ordering transactions as those that offer xDSL services using unbundled loops. This process is a little different than for unbundled xDSL loops since for line sharing, the loop has to be capable of supporting both the xDSL service and voice service. Whether a CLEC provides line sharing in Massachusetts or New York, it uses the same processes and systems to pre-qualify a loop for line sharing that CLECs use to pre-qualify an unbundled xDSL loop (described above), and the same processes that Verizon's SDA uses.

By the end of this year, Verizon's SDA will be in operation and fully in compliance with the conditions of the FCC's *Bell Atlantic/GTE Merger Order*. An SDA is, however, already in operation in New York (and Connecticut). The relationship between the separate data affiliate and Verizon in Massachusetts will be the same as that between the separate data affiliate and Verizon in New York.

Verizon's SDA, where it currently operates, uses the same pre-ordering interfaces and gateway systems as unaffiliated CLECs. The SDA uses CORBA and the Web GUI for its pre-ordering functions. The SDA also relies on the LiveWire database, as all other CLECs do, to determine if a loop is pre-qualified. If the loop qualification information is not in LiveWire, the SDA will not offer line sharing over that loop.

B. Ordering, Provisioning,

CLECs and the SDA use the same interfaces and gateway systems to submit LSRs for line sharing as CLECs use for requesting unbundled xDSL loops. Verizon's wholesale web site

provides extensive information on line sharing for CLECs, including information on collocation, order forms for line sharing collocation requests, line sharing ordering information and example LSRs. As with unbundled xDSL loops, these interfaces and gateway systems are identical for orders in Massachusetts and New York. The SDA, where it operates, submits orders using EDI. LSRs submitted by the SDA are processed by the same personnel, handled in the same manner and move through the same systems as LSRs submitted by unaffiliated CLECs.

Once a CLEC or the SDA submits its LSR, the LSR arrives in Verizon's Boston xDSL/Line Sharing Center, where a service order processing representative reviews it for accuracy and, assuming the LSR is correct, inputs the requisite information into Verizon's SOP. In doing so, the representative actually creates two service orders for each line sharing request -- one retail and the other wholesale. The function of the retail order is to provide a notation on the customer's existing retail customer service record to indicate that a line sharing arrangement is on the line. The retail order also moves through the same provisioning and billing systems as orders for stand-alone xDSL loops. However, from a programming perspective, certain provisioning and inventorying systems may handle the line sharing retail order differently from unbundled xDSL orders. This is because, unlike an xDSL order which is establishing a new stand-alone facility, a line sharing order is taking an existing working retail service and creating a new record associated with a circuit ID for the high frequency portion of the loop. In addition, the processes need to associate the new UNE circuit ID with the existing retail service record. The wholesale order functions to create a line record for the portion of the loop that belongs to the CLEC or the SDA, and to initiate billing to the CLEC or the SDA.

There are a few significant differences between the provisioning of line sharing and unbundled xDSL loops. First, the CLEC or SDA does not perform any up-front testing of the loop before Verizon turns over the completed line sharing arrangement. Such testing is unnecessary since dial tone is already present on the loop. Line sharing CLECs or the SDA can, however, have certain test equipment installed to test the line for maintenance and repair purposes after they accept the loop.

Second, in most instances, Verizon does not need to dispatch a technician into the field for line sharing orders. In most cases, Verizon need only dispatch a technician to the central office to complete the requisite wiring work for line sharing. In a few instances, such as where Verizon must perform a line and station transfer to make a copper loop available to the CLEC or the SDA, Verizon must dispatch a technician.

Once the provisioning work is complete, SOP notifies Verizon's gateway system that the order is complete, and the gateway system in turn generates a completion notice which is delivered to the CLEC or SDA via its electronic interface. As with unbundled xDSL loops, the SOP also sends the necessary billing information to Verizon's billing systems where the CLEC's or SDA's bill is generated.

Through September 30th, Verizon had completed 15 line sharing orders in Massachusetts. In New York, Verizon has provisioned close to 7,000 line sharing orders, the majority of which were for the SDA.

C. Maintenance and Repair

CLECs use the same maintenance and repair systems and processes for line sharing in both New York and Massachusetts. These processes and systems are also the same for both Verizon's SDA and unaffiliated CLECs and are identical to those used for unbundled xDSL loops. Where it is in operation, the SDA uses RETAS for Maintenance and Repair.

As with unbundled xDSL loops, a CLEC or the SDA can submit a trouble ticket for a shared loop using RETAS or EBI, or it can call in a trouble to the RCMC. Verizon offers repair appointments for line sharing on the same basis as it does for xDSL services.

Based on the information on the CLEC's or SDA's trouble ticket as to where the trouble is located, Verizon will dispatch a technician to either the central office or the field. Because Verizon is providing voice service to the end user, however, the presence of dial tone and Verizon's ability to perform an MLT provide additional information that can help locate the trouble in many instances. Once the technician fixes the problem on the line, he will close out the trouble ticket and the CLEC or SDA will be notified that the trouble has been cleared in the same manner described above for xDSL loops.

Feel free to contact me if you have any additional questions.

Sincerely,

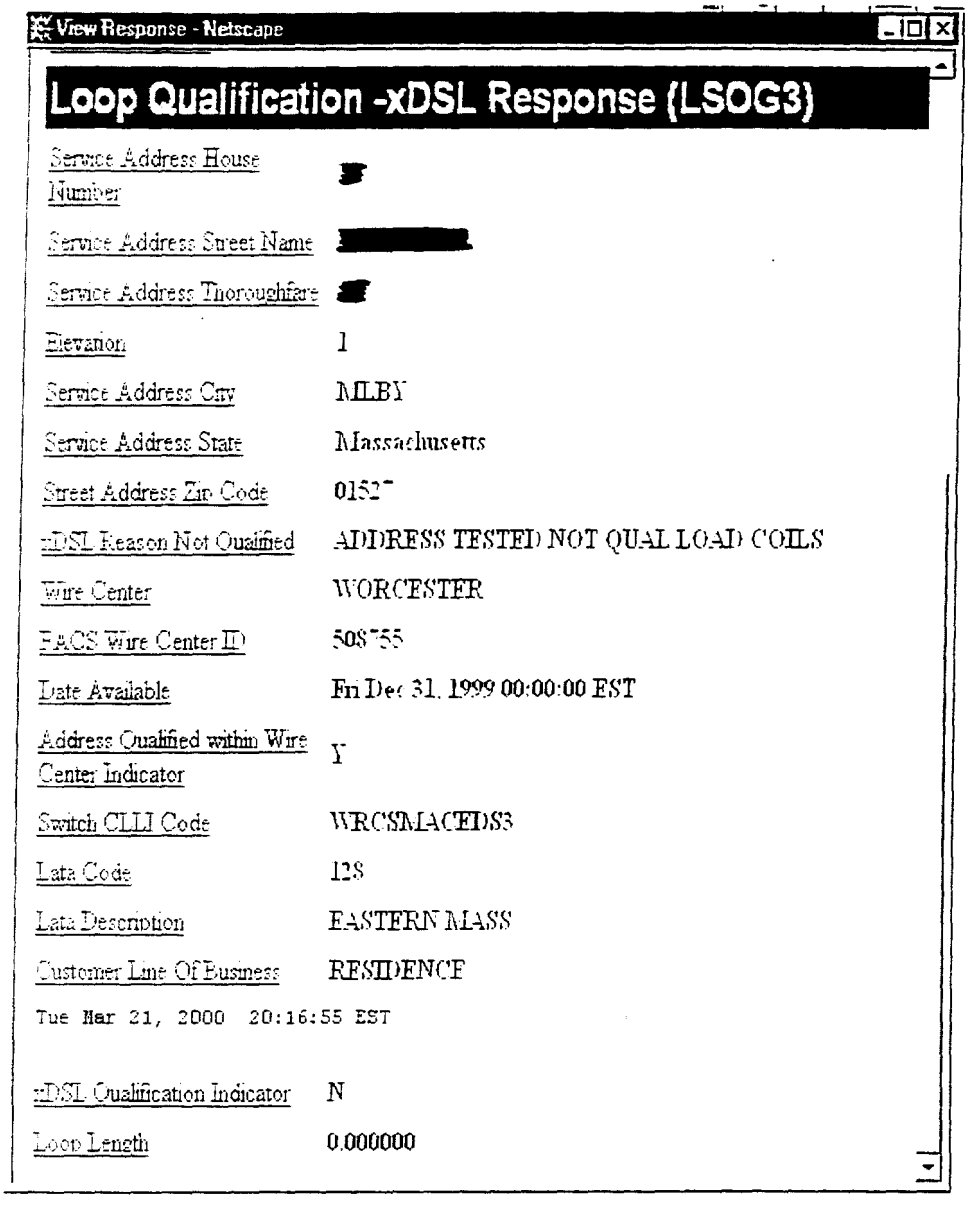
Dee May

Attachments

cc: S. Pie

ATTACHMENT A

Massachusetts Loop Qualification - xDSL Response – Loop Not Qualified



View Response - Netscape

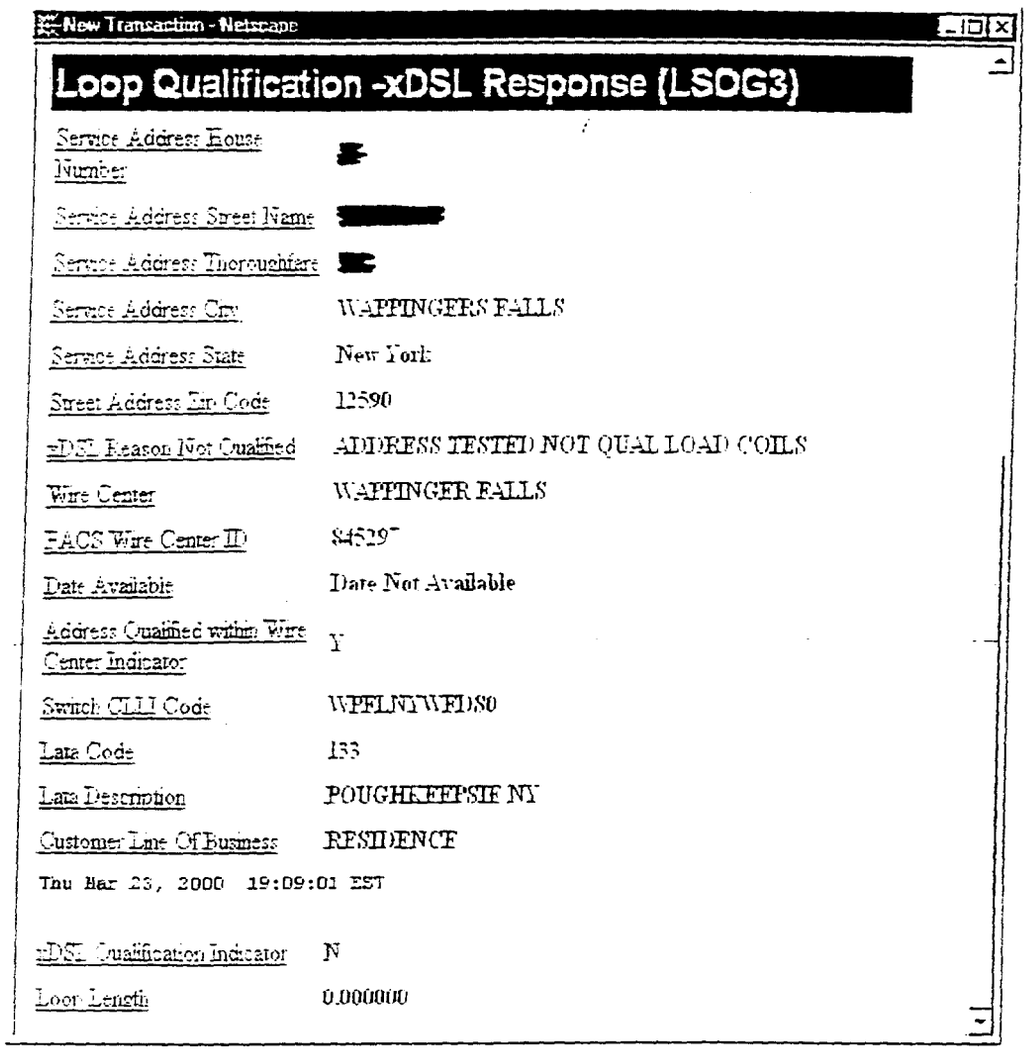
Loop Qualification -xDSL Response (LSOG3)

Service Address House Number	[redacted]
Service Address Street Name	[redacted]
Service Address Thoroughfare	[redacted]
Elevation	1
Service Address City	MLBY
Service Address State	Massachusetts
Street Address Zip Code	0152[redacted]
xDSL Reason Not Qualified	ADDRESS TESTED NOT QUAL LOAD COILS
Wire Center	WORCESTER
FACS Wire Center ID	508755
Date Available	Fri Dec 31, 1999 00:00:00 EST
Address Qualified within Wire Center Indicator	Y
Switch CLLI Code	WRCSMACEDS3
Lata Code	128
Lata Description	EASTERN MASS
Customer Line Of Business	RESIDENCE

Tue Mar 21, 2000 20:16:55 EST

xDSL Qualification Indicator	N
Loop Length	0.000000

New York Loop Qualification - xDSL Response – Loop Not Qualified


New Transaction - Netscape

Loop Qualification -xDSL Response (LSOG3)

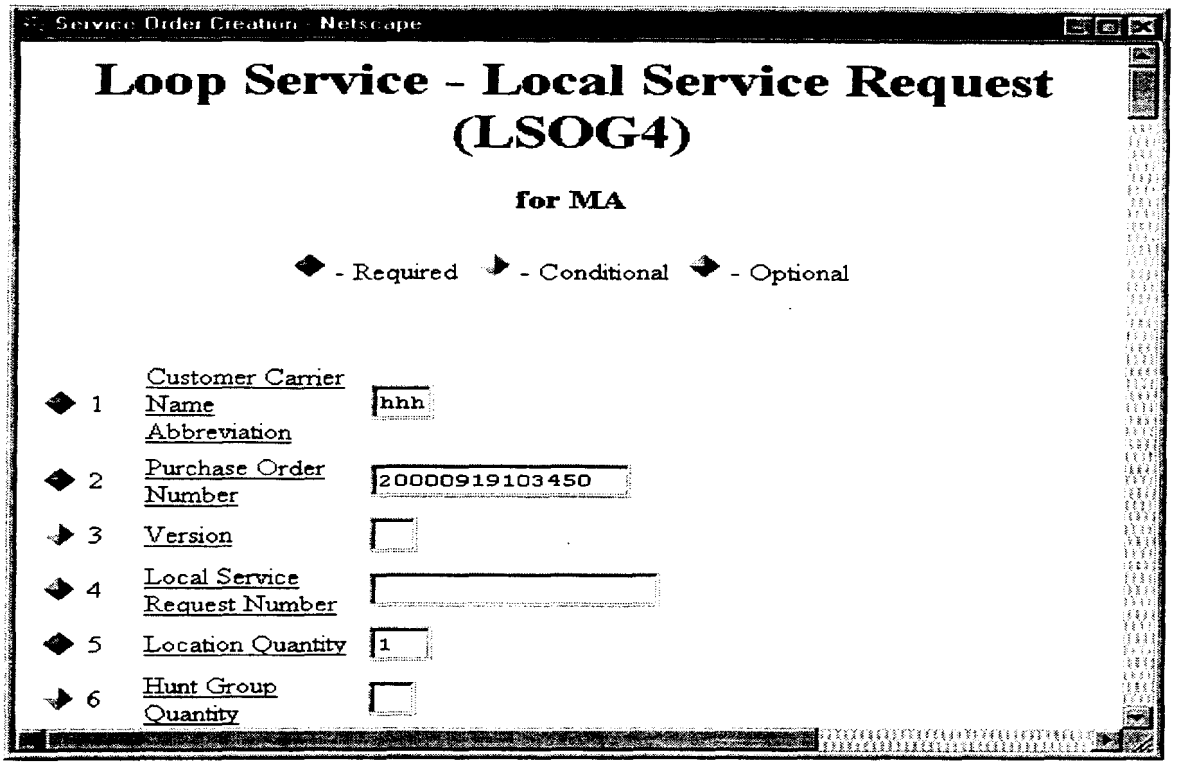
Service Address House Number	[redacted]
Service Address Street Name	[redacted]
Service Address Thoroughfare	[redacted]
Service Address City	WAPPINGERS FALLS
Service Address State	New York
Street Address Zip Code	12590
xDSL Reason Not Qualified	ADDRESS TESTED NOT QUAL LOAD COILS
Wire Center	WAPPINGER FALLS
FACS Wire Center ID	845297
Date Available	Date Not Available
Address Qualified within Wire Center Indicator	Y
Switch CLLI Code	WPFLNYWFDS0
Lata Code	133
Lata Description	POUGHKEEPSIE NY
Customer Line Of Business	RESIDENCE

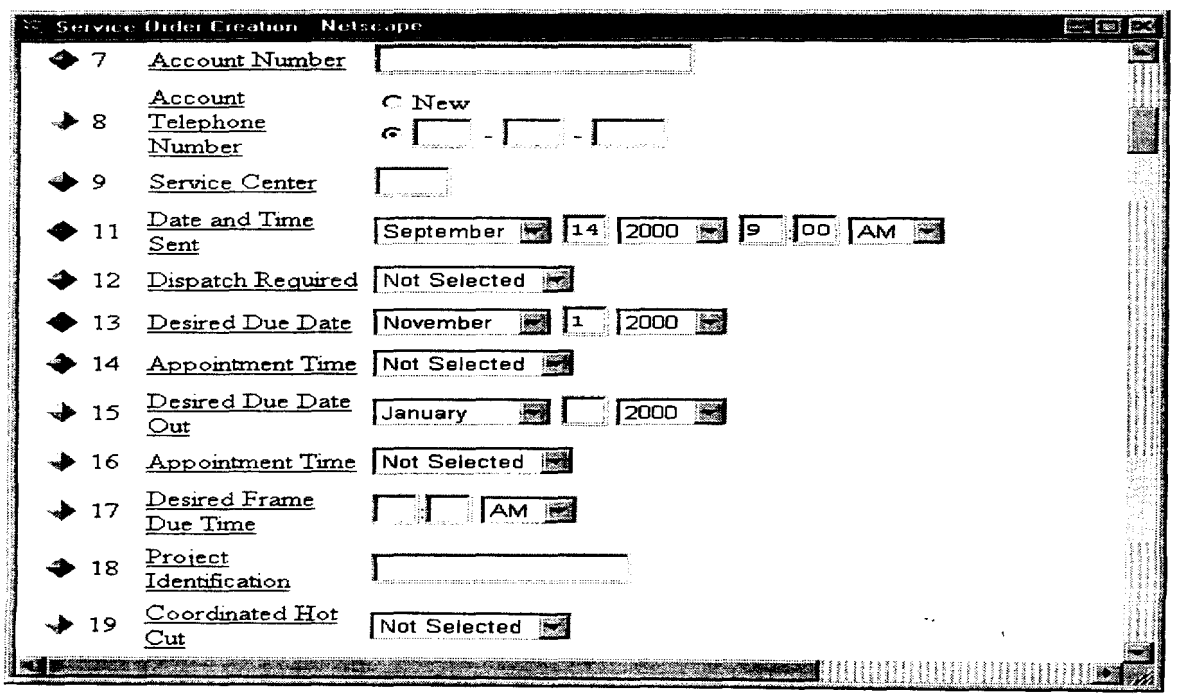
Thu Mar 23, 2000 19:09:01 EST

xDSL Qualification Indicator	N
Loop Length	0.000000

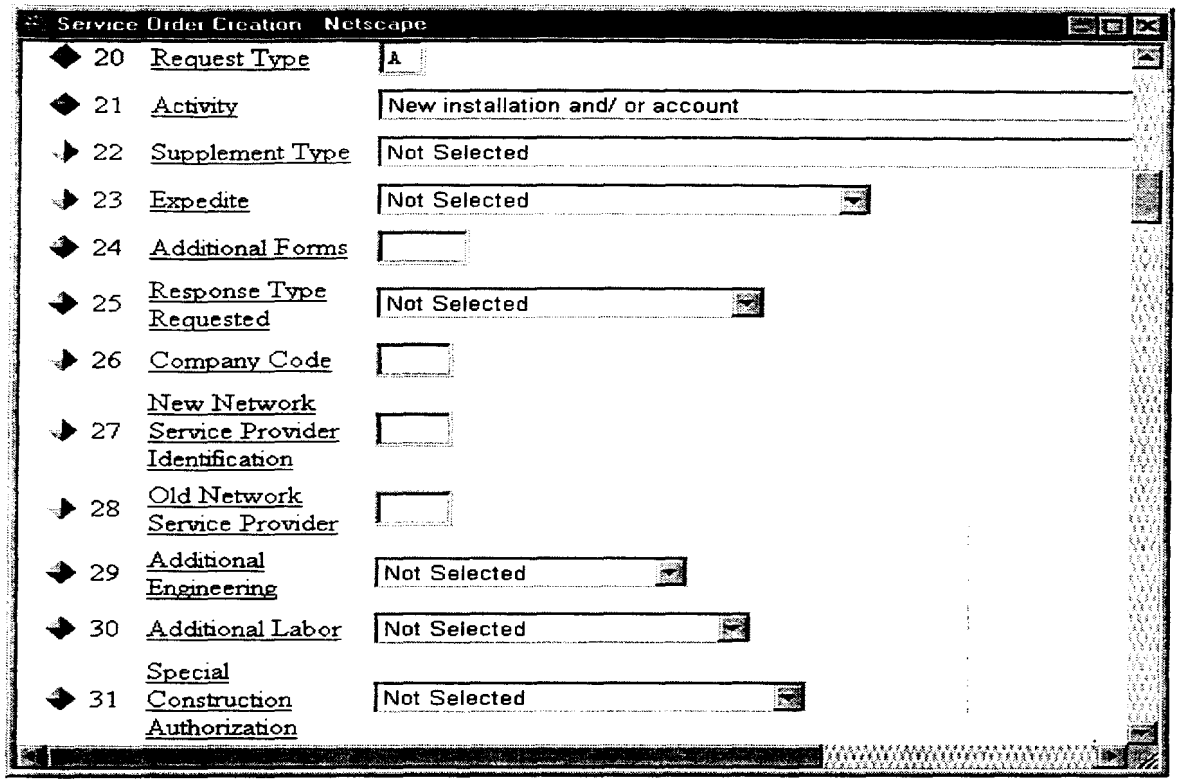
ATTACHMENT B

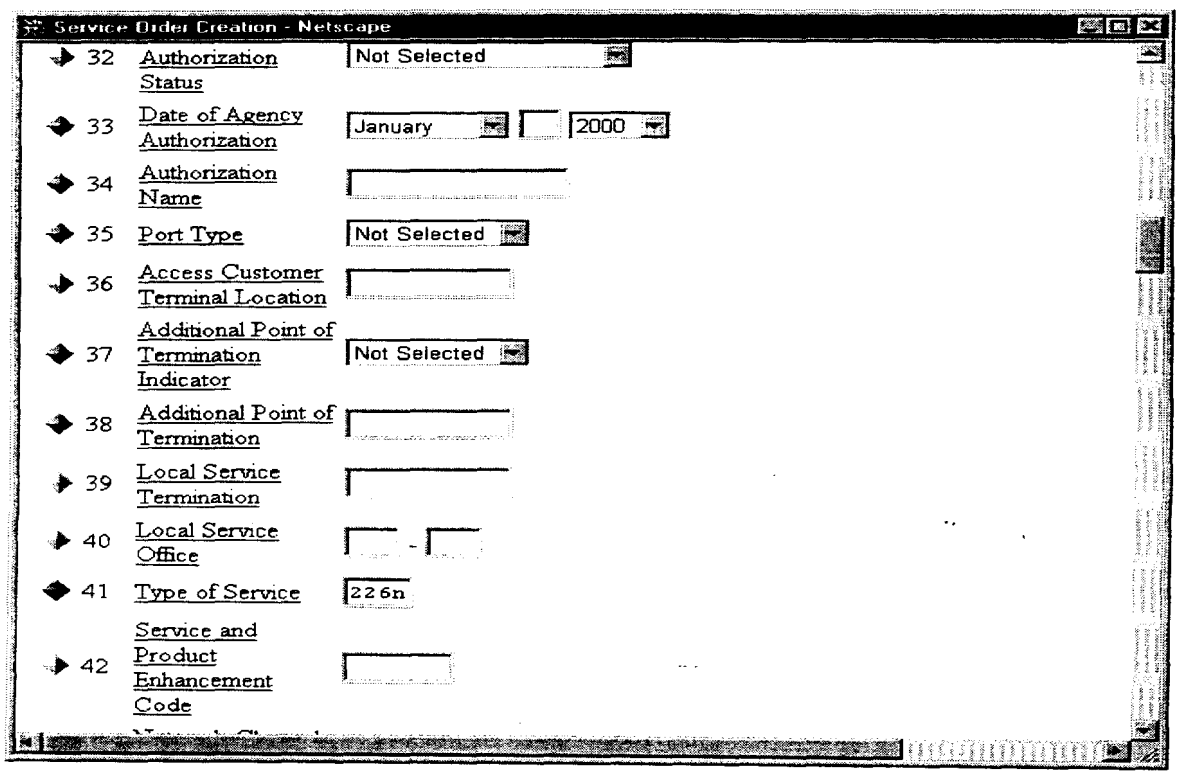
XDSL Local service Request (LSOG4)



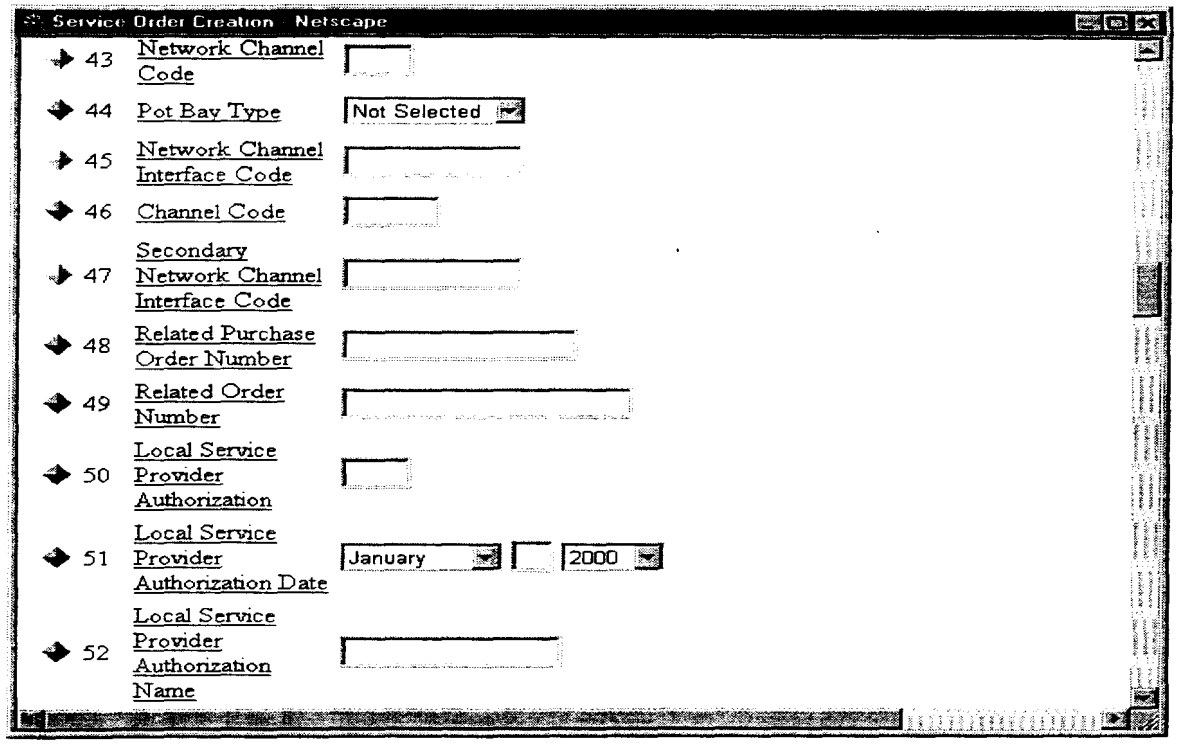


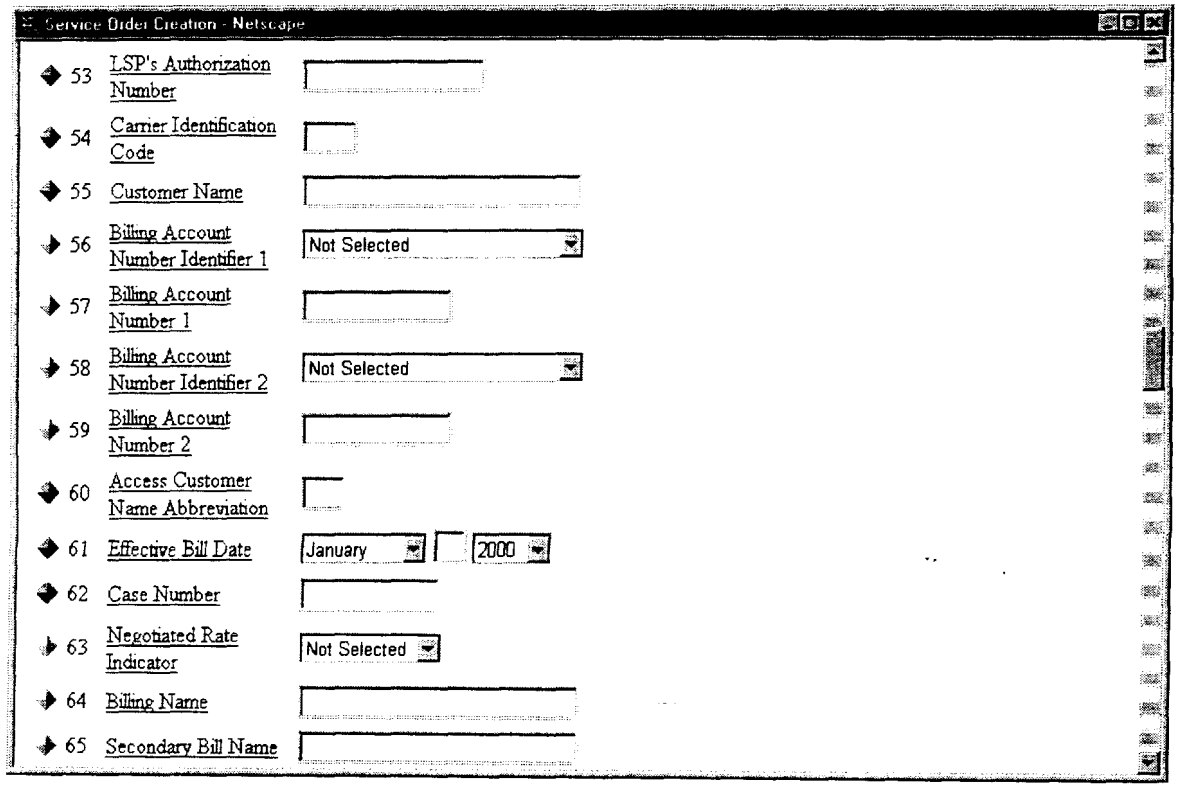
XDSL Local service Request (LSOG4)



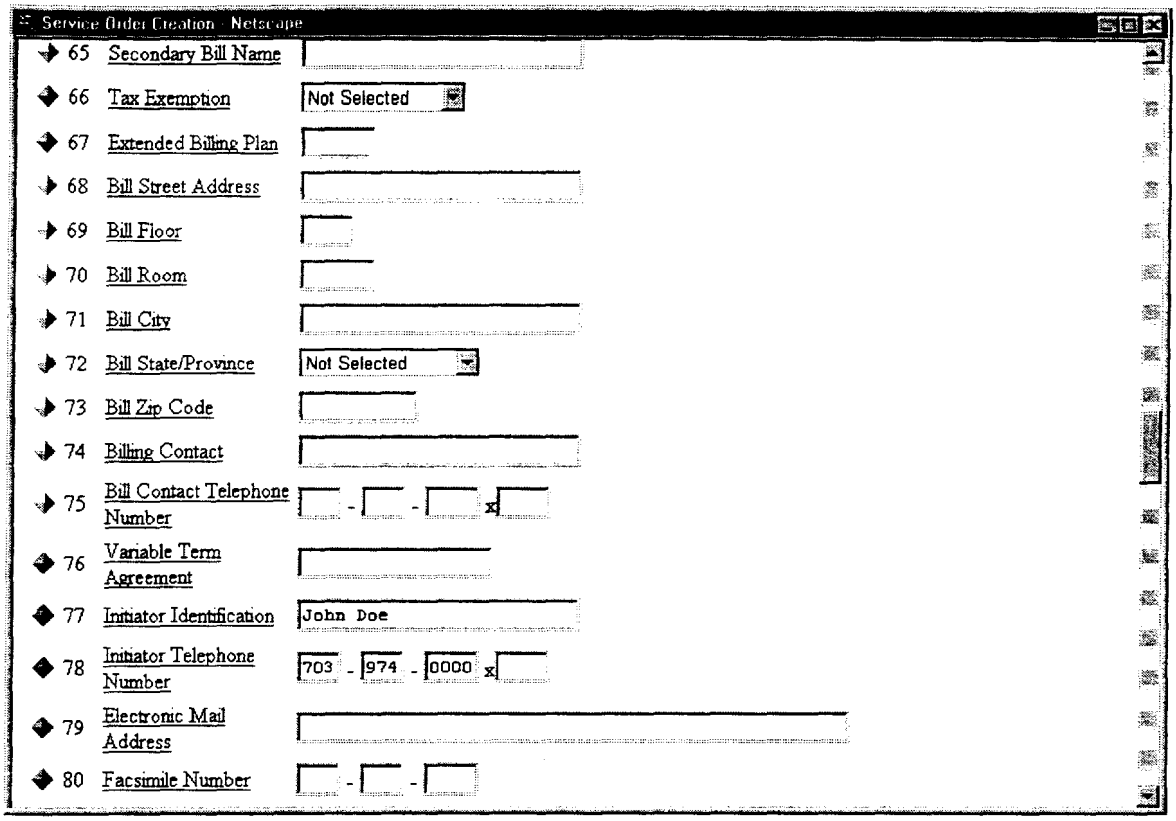


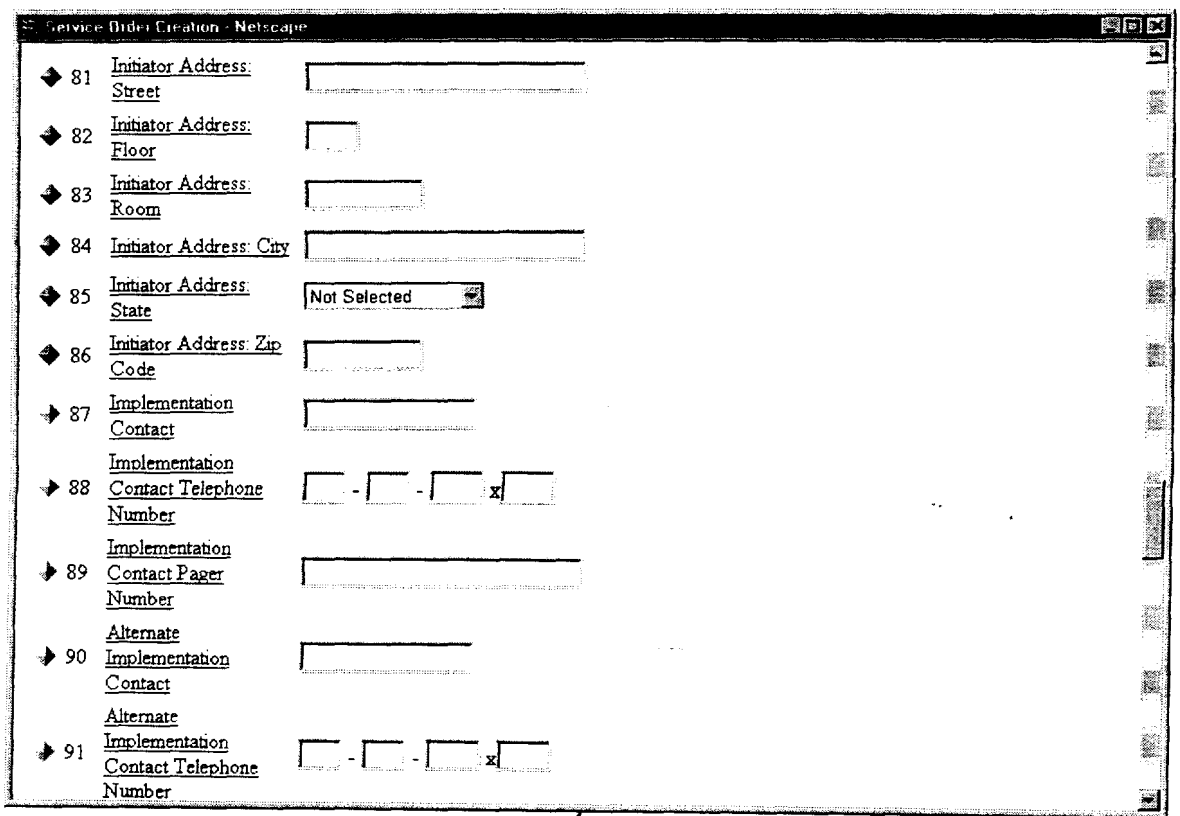
XDSL Local service Request (LSOG4)



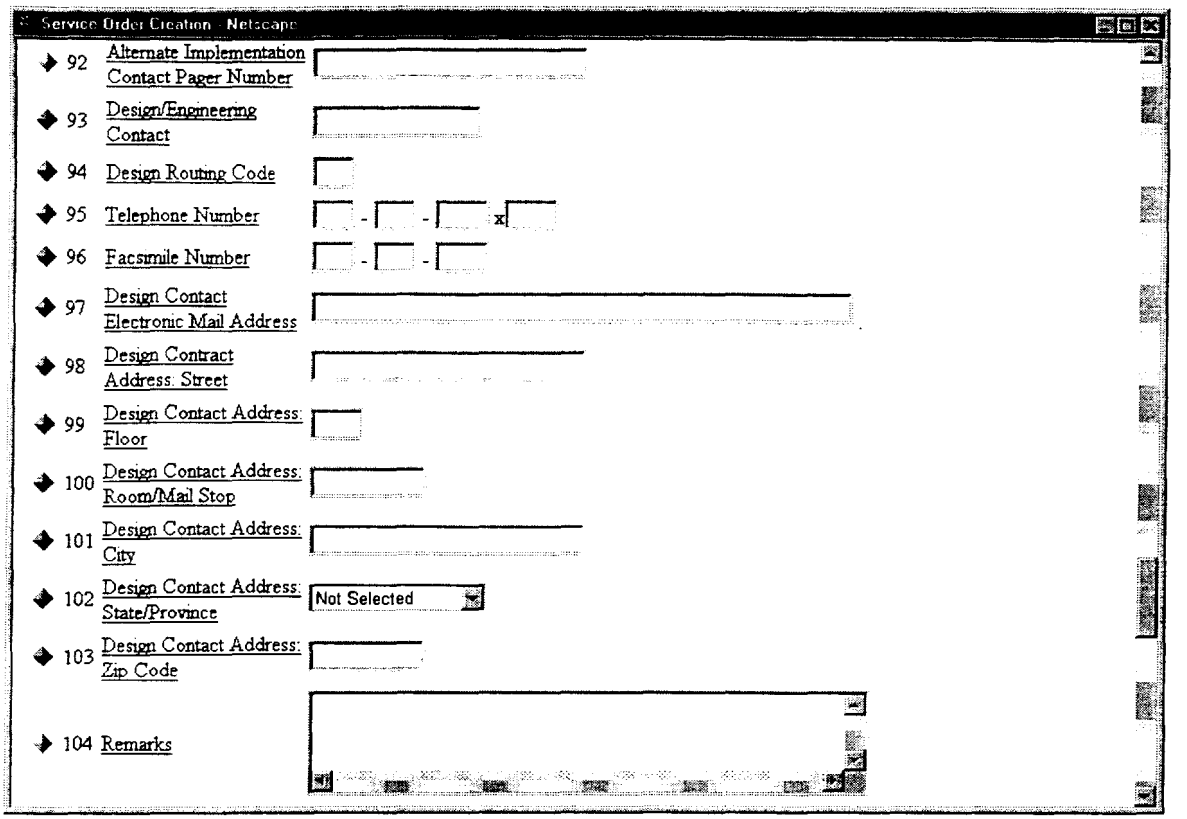


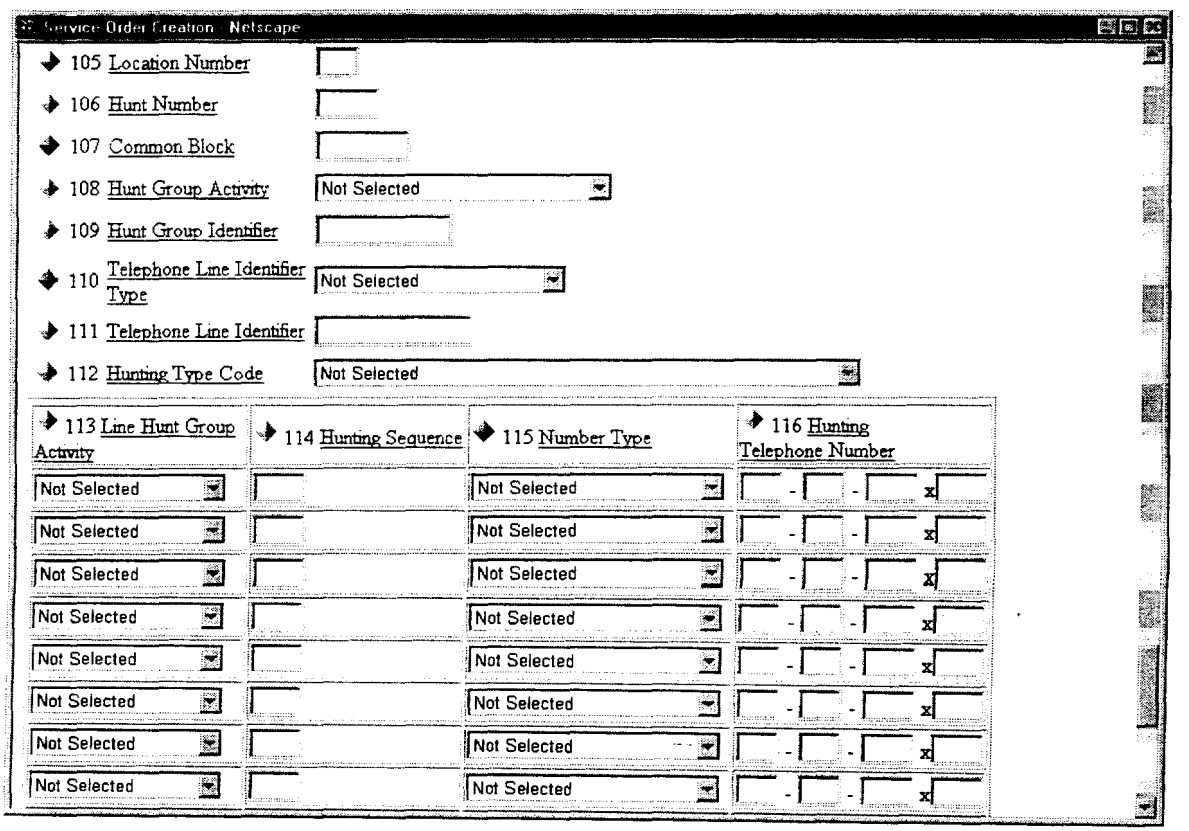
XDSL Local service Request (LSOG4)



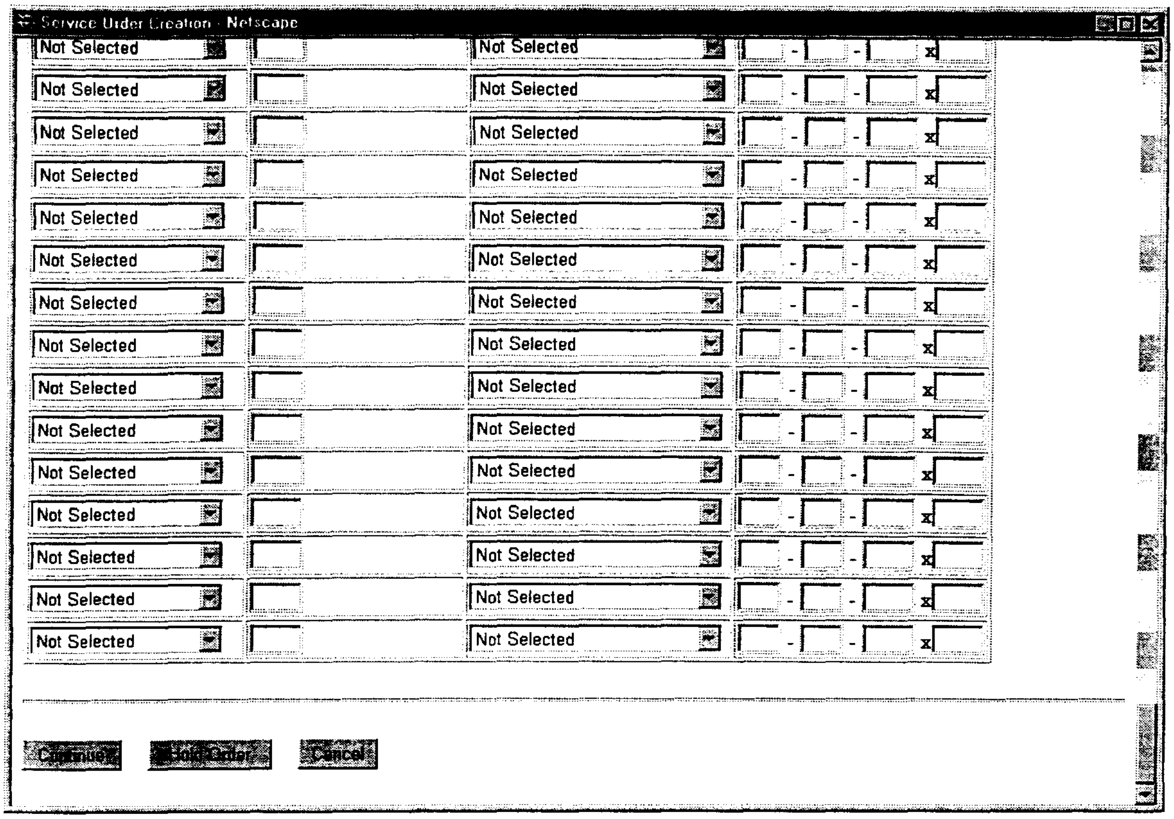


XDSL Local service Request (LSOG4)



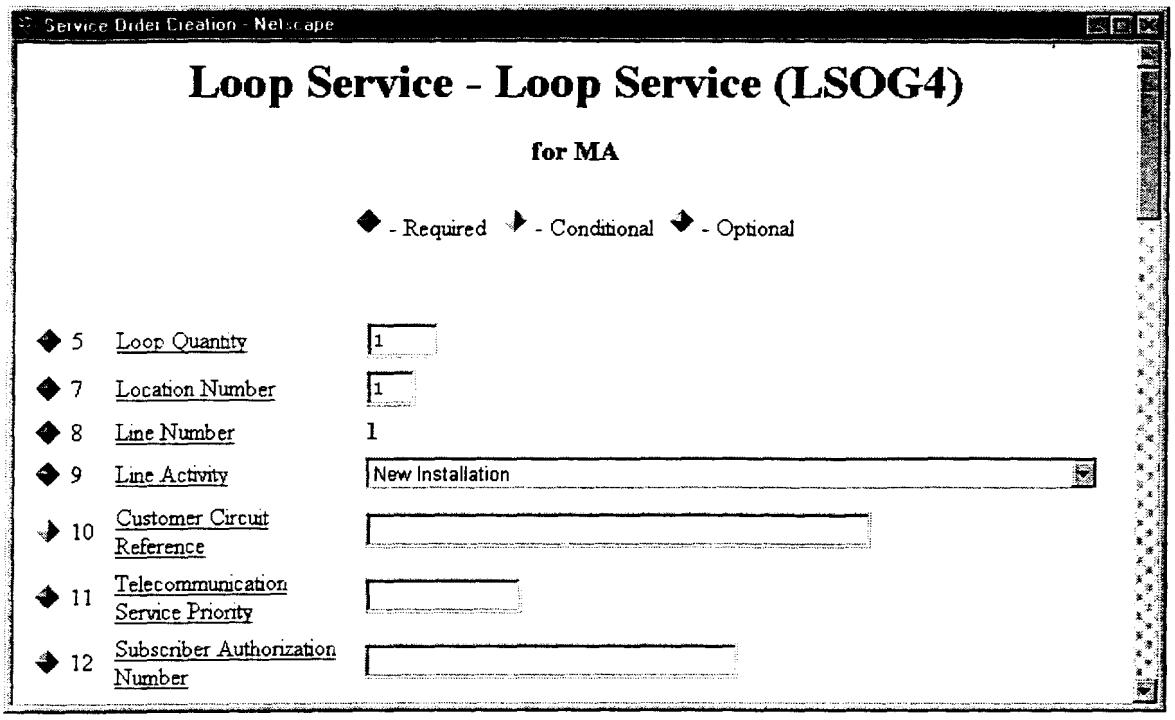


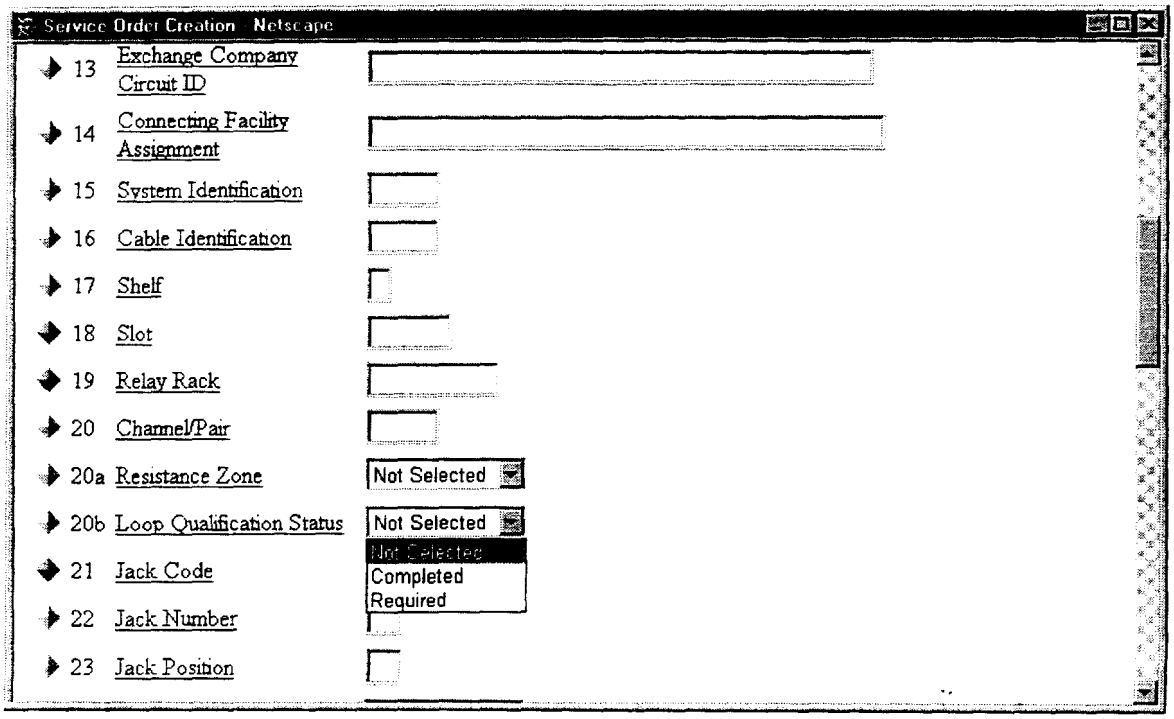
XDSL Local service Request (LSOG4)



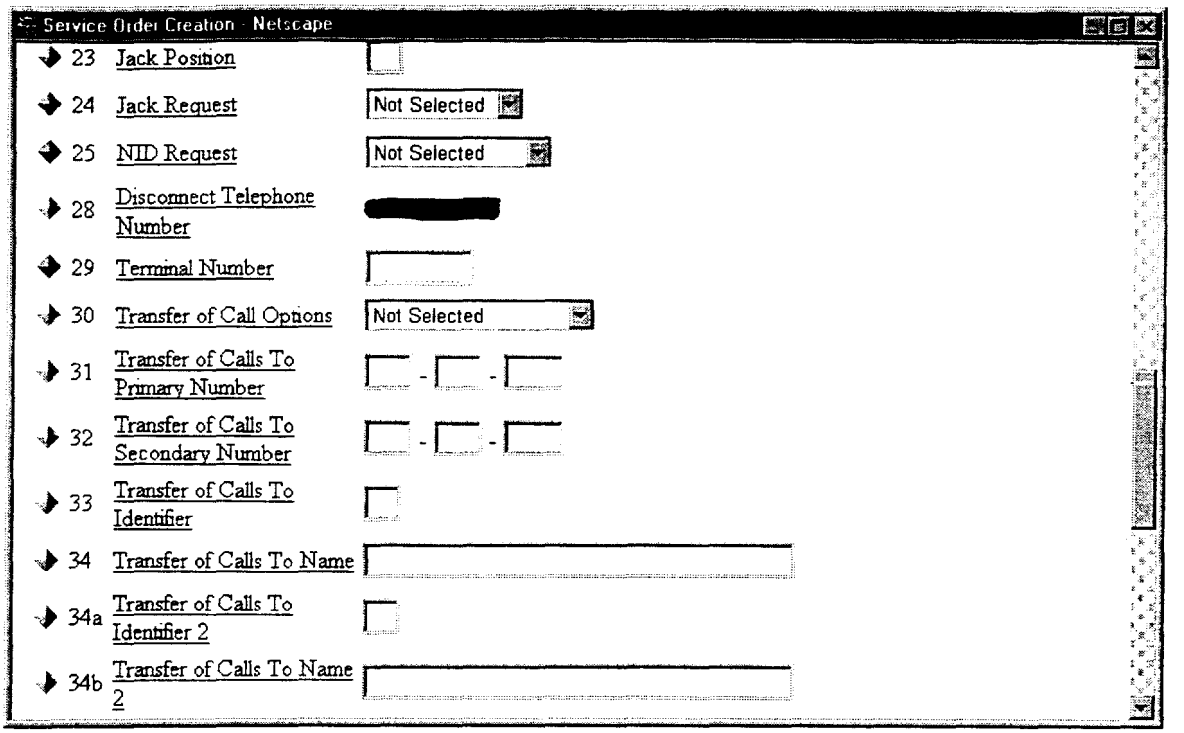
XDSL Local service Request (LSOG4)

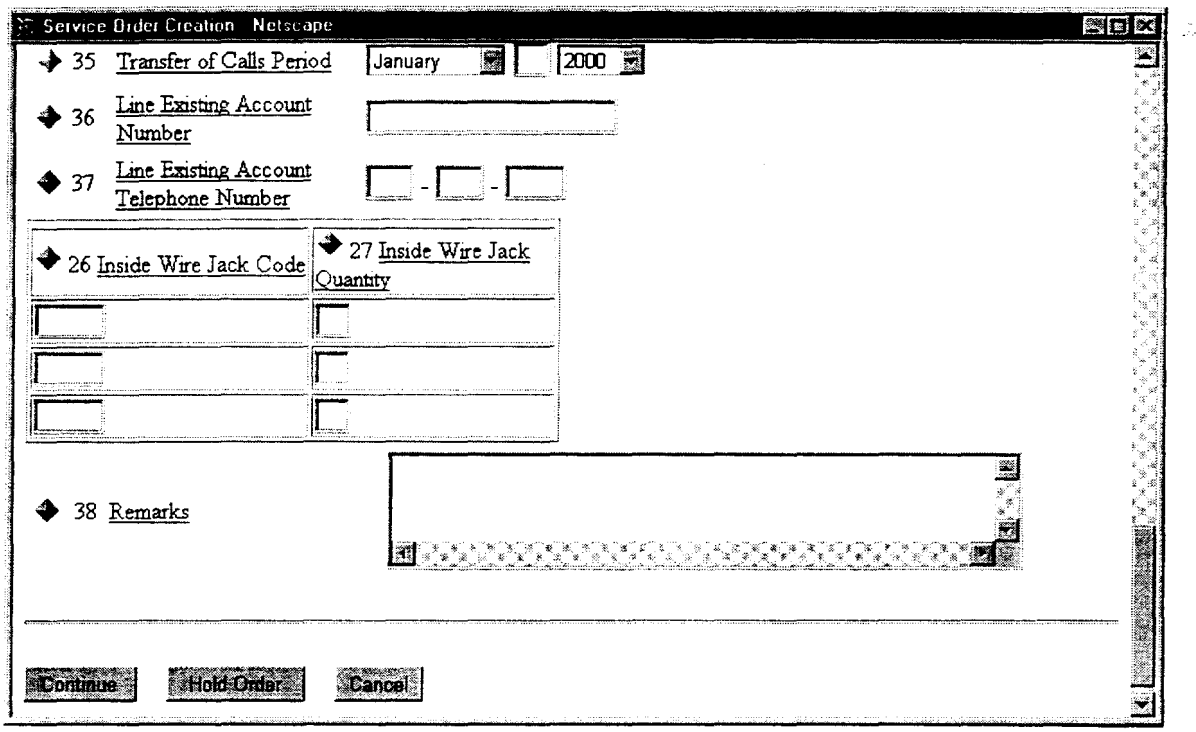
XDSL Loop Service (LSOG4)



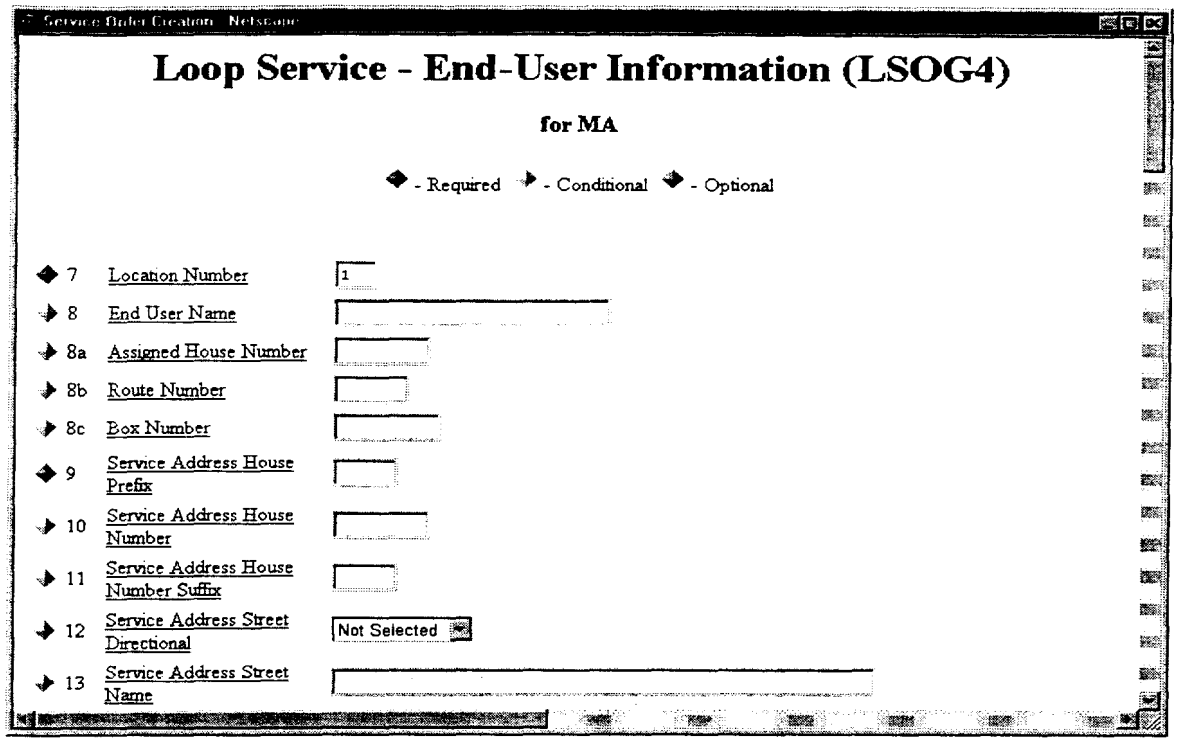


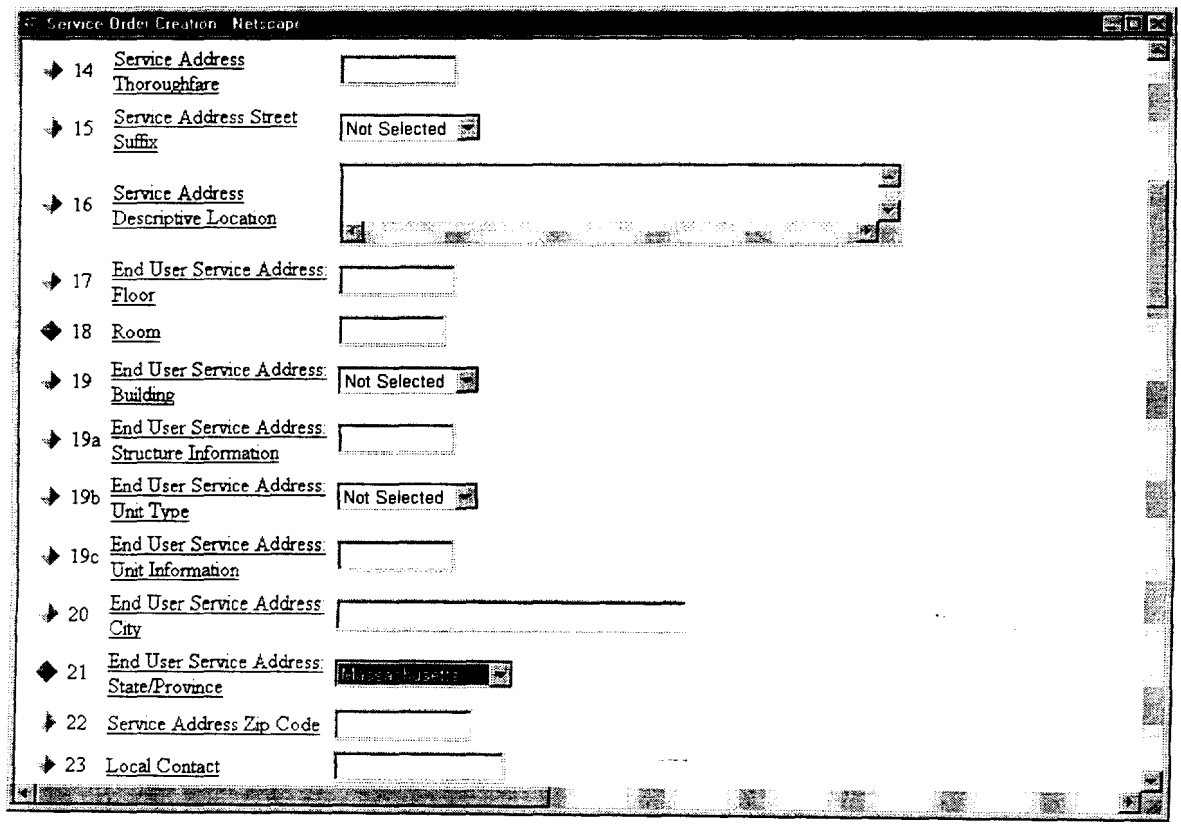
XDSL Loop Service (LSOG4)





XDSL End User Information (LSOG4)





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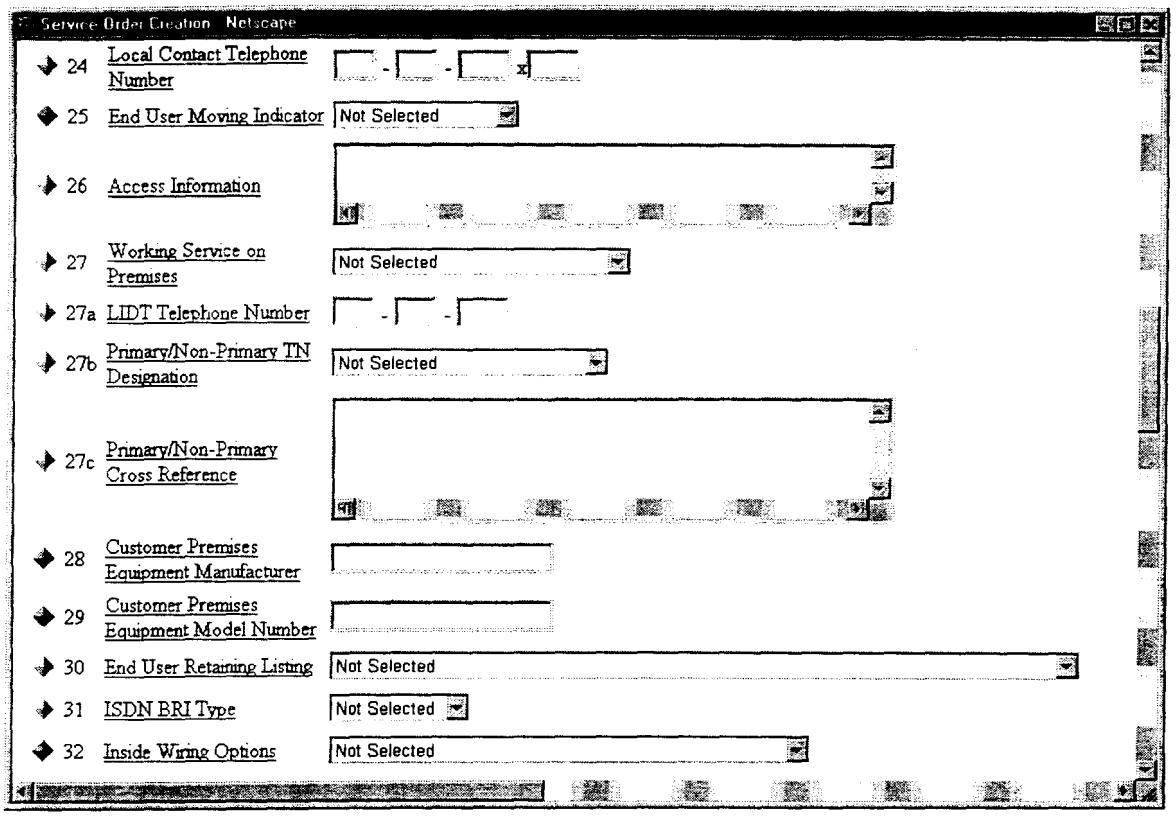

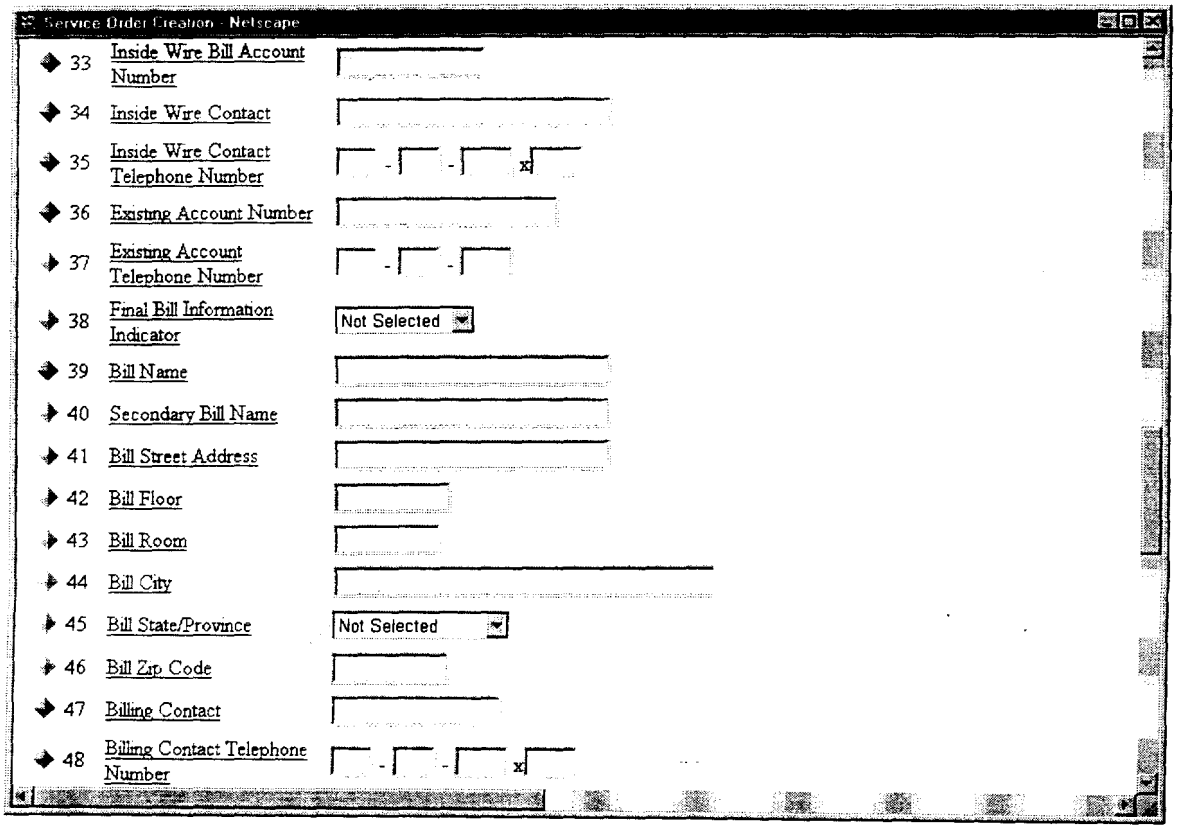

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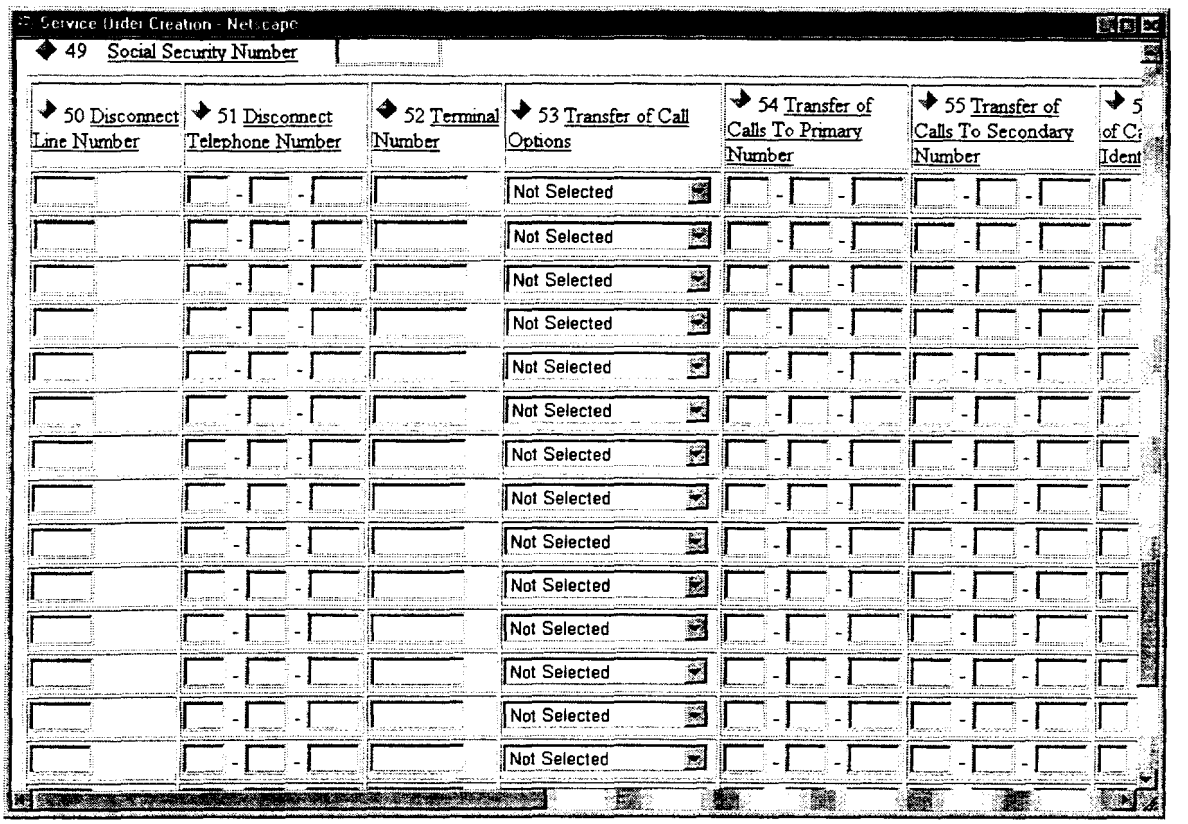

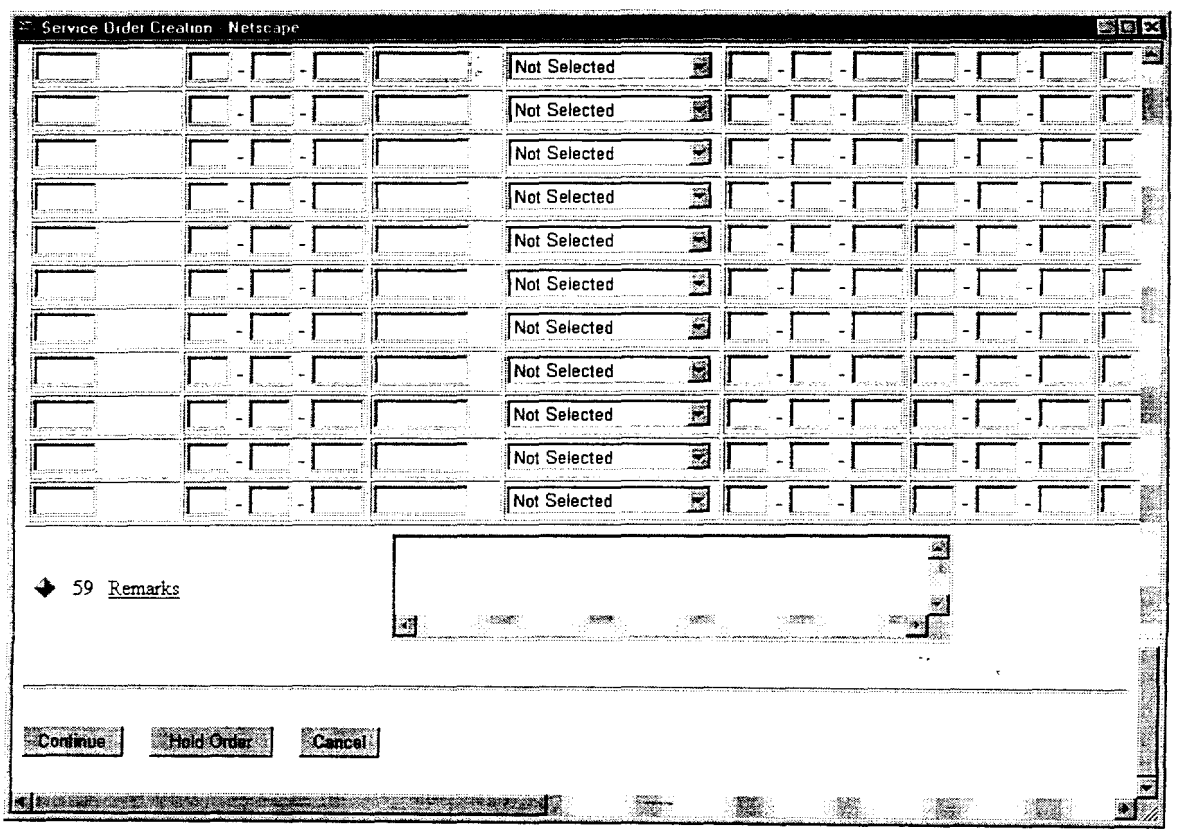

ATTACHMENT C

REDACTED—FOR PUBLIC INSPECTION

ATTACHMENT D